

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

SECURITIES AND EXCHANGE COMMISSION,

Plaintiff,

v.

Case No. 1:14-civ-11858-NMG

TELEXFREE, INC.,
TELEXFREE, LLC,
JAMES M. MERRILL,
CARLOS N. WANZELER,
STEVEN M. LABRIOLA,
JOSEPH H. CRAFT,
SANDERLEY RODRIGUES DE VASCONCELOS,
SANTIAGO DE LA ROSA,
RANDY CROSBY and
FAITH R. SLOAN,

Defendants,

and

TELEXFREE FINANCIAL, INC.,
TELEXELECTRIC, LLLP and
TELEX MOBILE HOLDINGS, INC.,

Relief Defendants.

**PLAINTIFF’S MOTION TO HOLD
DEFENDANT SANDERLEY RODRIGUES IN CIVIL CONTEMPT**

Plaintiff Securities and Exchange Commission (“the Commission”) hereby moves that the Court hold defendant Sanderley Rodrigues de Vasconcelos (“Rodrigues”) in civil contempt for repeated violations of the Temporary Restraining Order, Order Freezing Assets, and Order for Other Equitable Relief entered as to all defendants on April 14, 2014 (Dkt. #13), the Preliminary Injunction, Order Freezing Assets, and Order for Other Equitable Relief entered

against him personally on May 8, 2014 (Dkt. #89), and the Order to Provide Accountings and Carve-Out as to Rodrigues entered on June 10, 2015 (Dkt. #304).

In support of its motion, the Commission submits the Declarations of Scott Stanley, Esq. and Mark Albers and the accompanying memorandum of law.

Respectfully submitted,

/s/ Frank C. Huntington

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SECURITIES AND EXCHANGE COMMISSION

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Dated: August 12, 2015

Certificate of Service

I, Frank C. Huntington, certify that on August 12, 2015, the foregoing motion and the declarations of Scott Stanley and Mark Albers were filed electronically with the Court. Notice will be sent by e-mail to counsel of record through the Court's electronic filing system, and the filings may be accessed through the Court's system.

/s/ Frank C. Huntington
Frank C. Huntington